STRONGIN ROTHMAN & ABRAMS, LLP

50 Broadway, Suite 2003 New York, NY 10004 (212) 931-8300 Fax (212) 931-8319

NEW JERSEY OFFICE 70 South Orange Avenue, Suite 215 Livingston, NJ 07039 (973) 758-9301 Fax (973) 758-9302

DAVID ABRAMSDirect Dial (212) 931-8303
E-mail: dabrams@sralawfirm.com

April 11, 2005

VIA FACSIMILE: 718-797-7386 Magistrate Judge Kiyo A. Matsumoto United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: O'Donnell, Grace-Marie v. Club Mediterranee S.A., et al.

USDC/EDNY Docket No.: 05-CV-610 Our File No.: 165-5001

Dear Judge Matsumoto:

This firm represents defendants in the above matter pursuant to Your Honor's status report Order entered on April 4, 2005, we hereby advise the Court that all defendants have answered the Complaint which have been filed electronically filed today. Defendants are preparing a letter to the Court requesting a pre-motion conference with respect to their intended motion to dismiss this action based on the grounds *forum non-convenience* which later shall be filed shortly.

If you have any questions, please do not hesitate to contact the undersigned.

Very truly yours,

s/David Abrams

DAVID ABRAMS (DA-4758)

DA/sl

cc:

VIA FACSIMILE: 212-545-0967

Ravi Batra, Esq. The Batra Building 142 Lexington Avenue New York, New York 10016